

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Selene Danielle Arriaga,

Plaintiff,

v.

Thomas J. Dart, Sheriff of Cook County, Illinois;
The Northeast Regional Commuter Railroad
Corporation d/b/a Metra; Cook County, Illinois;
Marie Rangel, Joseph Perez; Paul Riggio; David
Cammack; Theodore Stajura; and Timothy
O'Donnell,

Defendants.

Case No: 20-cv-4498

The Honorable Judge Virginia Kendall
Presiding

Magistrate Judge Maria Valdez

COOK COUNTY DEFENDANTS' MOTION TO DISMISS COMPLAINT

Pursuant to Federal Rule of Civil Procedure ("Rule") 12(b)(6), Defendants, Thomas J. Dart, Sheriff of Cook County, Cook County, Maria Rangel, David Cammack, Theodore Stajura, and Timothy O'Donnell ("Cook County Defendants"), by their attorney, Kimberly M. Foxx, Cook County State's Attorney, through her assistant, Nazia Hasan, submit this Motion to Dismiss Plaintiff Selene Danielle Arriaga's Complaint.

In support of this Motion, Cook County Defendants rely on their contemporaneously filed Memorandum of Law in Support of their Motion to Dismiss Plaintiff's Complaint for failing to state a claim upon which relief can be granted.

Date: November 2, 2020

Respectfully submitted,

KIMBERLY M. FOXX
State's Attorney of Cook County

By: /s/ Nazia Hasan
Assistant State's Attorney

CERTIFICATE OF SERVICE

The undersigned certifies that on November 2, 2020, she electronically filed the foregoing document with the Clerk of the Court for the Northern District of Illinois by using the CM/ECF system. All participants in the case are registered CM/ECF users who will be served by the CM/ECF system pursuant to Rule 5(b)(2)(E) and LR 5.9.

By: /s/ Nazia Hasan
Assistant State's Attorney
500 Richard J. Daley Center
Chicago, Illinois 60602
(312) 603-3618
Nazia.Hasan@cookcountyil.gov